

The Honorable Thomas S. Zilly

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

ESTATE OF WANGSHENG LENG, by  
and through administrator, LIPING YANG,

Plaintiffs,

v.

THE CITY OF ISSAQUAH, ISSAQUAH  
POLICE OFFICER M. LUCHT #1201, and  
ISSAQUAH POLICE OFFICER KYLEN  
WHITTOM, #1210,

Defendants.

No. 2:19-cv-00490-TSZ

SUPPLEMENTAL DECLARATION  
OF SHANNON M. RAGONESI

I, Shannon M. Ragonesi, declare as follows:

1. I am one of the attorneys representing the Defendants in this lawsuit. I make this declaration based upon my own personal knowledge, upon facts which are admissible in evidence. I am competent to testify to the matters set forth in this declaration.

2. The following exhibits are cited or relied upon in Defendants Reply in Opposition to Motion for Summary Judgment:

A. Attached as **Exhibit 1** is a true and correct copy of the Department of Justice letter to (former) Mayor McGinn, dated November 23, 2011. This is a public record and available on the internet.

1 B. Attached as **Exhibit 2** is a true and correct copy of the King County  
2 letter to Dow Constantine, dated October 1, 2019. This is a public record and was  
3 produced to Plaintiff during discovery in this case;

4 C. Attached as **Exhibit 3** is a true and correct copy of excerpts of  
5 Officer Michael Lucht's deposition transcript.

6  
7 I declare under penalty of perjury under the laws of the State of Washington that the  
8 foregoing is true and correct to the best of my knowledge.

9  
10 DATED this 18th day of September, 2020, at Seattle, Washington.

11  
12 /s/ Shannon M. Ragonesi  
13 Shannon M. Ragonesi, WSBA #31951

**CERTIFICATE OF SERVICE**

I hereby certify that on September 18, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

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DATED: September 18, 2020

/s/ Shannon M. Ragonesi

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